

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

EVGENII ZAVODCHIKOV, et al.,

Defendants.

CA No. 16-cv-00845 (MCA-LDW)

**PLAINTIFF'S REQUEST FOR ENTRY
OF DEFAULT AGAINST INDIVIDUAL
DEFENDANTS**

**TO: The Clerk of the Court
United States District Court
For the District of New Jersey**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff Securities and Exchange Commission (the "Commission") hereby requests the entry of a default in the above-captioned matter against Defendants Evgenii Zavodchikov, Andrey Bokarev, Radion Panko, Natalia Andreevna Alepko, and Anton Maslov (collectively, the "Individual Defendants"), based upon each of the Individual Defendants' failure to file an answer or otherwise respond to the Complaint which was due on November 1, 2017, at the latest.

In support of this request, the Commission incorporates the Declaration of John Donnelly, attachment A hereto, as if fully set forth herein. The Declaration establishes that the Individual Defendants were served with process in accordance with the Court's Order granting the Commission's Motion for Alternative Service (Docket No. 18), and that each of the Individual Defendants has failed to plead, move, or otherwise respond or defend. Further, as set forth in the Declaration, none of the Individual Defendants is an infant; and, on information and belief, none of the Individual Defendants is incompetent or in the military service.

WHEREFORE, Plaintiff respectfully requests entry of default in the form submitted herewith as attachment B.

Respectfully submitted,

By: /s John Donnelly

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February 26, 2018